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Maria
Chappelle~Nadal

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OFFICE OF GENERAL
COUNSEL
August 9, 2016

Maria Chappelle-Nadal
Missouri General Assembly
St. Louis County Democrat

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Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Citizens for Maria Chappelle-Nadal
MUR 7108

Dear Mr. Jordan:

This is in response to your letter of July 25, 2016, and the corresponding letter of complaint from Mary Patricia Dorsey dated July 8, 2016. Ms. Dorsey complains about a campaign "doorhanger" (she calls it a "flyer").

Ms Dorsey's complaint states that I was using money from my "State Senate Campaign fund to provide money to Jay Mosely and Rochelle Walton Gray whose campaigns paid for the enclosed flyer." The complaint concludes: "This appears to me to be a violation of federal election law."

Ms. Dorsey is wrong. There is no violation of state or federal election laws shown by the facts surrounding this doorhanger.

The doorhanger in question includes my photo and name as a candidate for Congress on the front side, below those of Rochelle Walton Gray for County Council and Jay Mosely for State Representative, and above those of two candidates for Committee people. The back side of the doorhanger features primarily Mr. Mosely and his qualifications, repeating at the bottom the name and photo of Ms. Gray.

The bottom of the back of the doorhanger is clearly marked "Paid for by Citizens to Elect Gray, Angela Mosely, Treasurer & by Citizens to Elect Jay Mosely, LLC, Angela Mosely, Treasurer." This accurately reflects that the doorhanger was not paid for in any part by my state candidate committee, Citizens for Maria Chappelle-Nadal.

Citizens for Maria Chappelle-Nadal contributed to Citizens to Elect Gray and Citizens to Elect Jay Mosely LLC and properly reported these contributions to the Missouri Ethics Commission, as shown by the forms Ms. Dorsey attached to her complaint.

Guided by the Courage of her Convictions

Paid for by Citizens for Maria Chappelle Nadal, Neva Taylor, Treasurer

These contributions by Citizens for Maria Chappelle-Nadal were for the sole purpose of supporting the campaigns of Ms. Gray and Mr. Mosely. Decisions concerning expenditure of these funds, once contributed, were entirely at the discretion of the Gray and Mosely candidate committees.

Under Missouri election law, which does not restrict the amounts of political contributions, these contributions constituted lawful use of funds in the Citizens for Maria Chappelle-Nadal state candidate committee account. Under RSMo § 130.034.2(5), contributions to support a candidate for state or local office may be used to contribute to another candidate's campaign committee.

The decision by the Gray and Mosely campaign committees to prepare and distribute the doorhanger, and to include me on it, was a separate transaction from the donations by Citizens for Maria Chappelle-Nadal.

Neither I nor anyone associated with my Congressional campaign had any involvement in the planning, preparation, printing, or distribution of the doorhanger.

Therefore, although my name and photo appeared on the doorhanger, the contributions of Citizens for Maria Chappelle-Nadal to the Gray and Mosely candidate committees did not constitute an expenditure of my state campaign committee's funds in support of my Congressional campaign. Rather they represented the free choice of the Gray and Mosely candidate committees to include me on their doorhanger.

Thus, contrary to Ms. Dorsey's implication, there was no spending by the state campaign committee Citizens for Maria Chappelle-Nadal to support my congressional campaign. For this reason, there was no violation of the federal election law prohibiting use of state campaign funds to support a federal campaign.

I trust this answers your questions concerning Citizens for Maria Chappelle-Nadal's compliance with applicable law, as raised by Ms. Dorsey.

Sincerely,



Maria Chappelle-Nadal